

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

ROBERT JAMES FISCHER

Defendant.

:
:
:
:
:
:
:
:

CASE NO. 1:23-CR-112 (TSE)

**UNOPPOSED MOTION TO EXTEND DEADLINE
FOR PRETRIAL MOTIONS AND RESCHEDULE MOTIONS HEARING**

COMES NOW the Defendant, Robert James Fischer, by counsel, and moves the Court to reschedule the deadline to submit pretrial motions to August 25, 2023, and to reschedule the motions hearing, if any, to September 15, 2023.

1. Mr. Fischer was indicted on June 29, 2023 on the charge of conspiracy to distribute controlled substances, including at least 50 grams of methamphetamine. He was arraigned on July 14, 2023, at which time the Court set a deadline to file pretrial motions by August 11, 2023, with a motions hearing, if necessary, to be held on September 1, 2023. The Court also entered a Protective Order regarding discovery.

2. The parties are actively engaged in discussions regarding possible resolutions to the case. Additionally, the volume of discovery is substantial, as is the time necessary to review it with Mr. Fischer, who is detained at Northern Neck Regional Jail, particularly in light of the limitations imposed by the Protective Order.

3. The Government has no objection to the requested resetting of the motions deadline and motions hearing.

Accordingly, counsel for Mr. Fischer moves the Court to extend the motions filing deadline to August 25, 2023 and to reset the motions hearing, if one becomes necessary, to September 15, 2023.

Respectfully Submitted,
Robert James Fischer
By Counsel

ELSAYED LAW PLLC

BY: _____/s/
Muhammad Elsayed
Virginia Bar No. 86151
3955 Chain Bridge Road
Second Floor
Fairfax, Virginia 22030
(703) 884-2636
(703) 884-2637 (fax)
me@elsayedlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was filed electronically using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

_____/s/
Muhammad Elsayed
Virginia Bar No. 86151
3955 Chain Bridge Road
Second Floor
Fairfax, Virginia 22030
(703) 884-2636
(703) 884-2637 (fax)
me@elsayedlaw.com